

SECTION I. GENERAL PERMIT CONDITIONS

I.A. Scope and Effect of Permit

1. The Permittee is required to investigate releases of hazardous constituents from Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs), and perform corrective action to remediate releases in accordance with the conditions of this permit. Any hazardous waste treatment, storage or disposal not specifically authorized in this Permit is prohibited. The Permittee must comply with the Georgia Hazardous Waste Management Act and the Georgia Rules for Hazardous Waste Management, Chapter 391-3-11, which Rules include certain portions of the Federal Hazardous Waste Regulations (found in 40 CFR Parts 260-266, 268, 270, 273, 279, and 124). Where a citation to the Federal Regulations is made in this Permit, it refers to the specific regulations adopted by the Environmental Protection Division (EPD) of the Georgia Department of Natural Resources.
2. The issuance of this Permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.
3. Compliance with this Permit does not constitute a defense to any action brought by the Director under Section §12-8-75, "Powers of Director in situations involving imminent and substantial endangerment to the environment or to public health," of the Georgia Hazardous Waste Management Act, as amended.
4. Nothing in this Permit shall be construed to preclude the institution of any legal action under Section 3008 of the Federal Resource Conservation and Recovery Act (RCRA) or under the Georgia Hazardous Waste Management Act, O.C.G.A. §12-8-81 through §12-8-82, as amended.
5. This Permit may be modified, revoked and reissued, or terminated for cause as specified in Rule 391-3-11-.11(7) and 40 CFR 270.41, 270.42, and 270.43, 270.50(d), and 270.51(d). The filing of a request for a permit modification, revocation and reissuance, or termination, or the notification of planned changes or anticipated noncompliance on the part of the Permittee, does not stay the applicability of any permit condition.
6. The provisions of this Permit are severable, and if any provision of this Permit or the application of any provision of this Permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this Permit shall not be affected thereby.

I.B. Management Requirements

1. The Permittee may not commence treatment, storage or disposal of hazardous waste at any new or substantially modified portion of the facility until the Permittee has submitted to the Director by certified mail, or hand delivery, a letter signed by the Permittee and a

registered professional engineer or, when appropriate, registered professional geologist, stating that the facility has been constructed or modified in compliance with the permit where appropriate; and the Director has inspected the modified or newly constructed facility and finds it is in compliance with the conditions of the permit; or the Director has either waived the inspection of, or within fifteen (15) days has not notified the Permittee of his or her intent to inspect.

2. The Permittee shall maintain at the facility, and have available upon request, the following documents and amendments, revisions, and modifications to these documents associated with investigative and corrective action activities:
 - a. Complete copy of this permit and the Hazardous Waste Facility Permit Application, dated July 2012 (Permit Application), including all amendments, revisions and modifications;
 - b. Inspection Schedule and Log;
 - c. Operating Log, in accordance with 40 CFR 264.73(a), to include, but not limited to the following:
 - i. The records and results of inspections of groundwater monitoring wells, and remedial treatment systems (except that these records need only be kept three years),
 - ii. Corrective action cost estimates,
 - iii. The certification required by 40 CFR 264.73(b)(9), and
 - iv. Any records required under 40 CFR 264.1(j)(13).
 - d. Institutional and/or Engineering Control Instruments/Plans that include measures to prevent exposure to contaminants from solid waste management units, corrective action treatment units, and facility related groundwater monitoring and remediation wells; and vandalism thereof;
 - e. Contingency Plan;
 - f. Financial assurance instrument for corrective action;
 - g. Corrective Action Plan;
 - h. Groundwater Sampling and Analysis Plan; and
 - i. Records from all groundwater monitoring wells and associated groundwater surface elevations as required by 40 CFR 264.73(b).
3. All amendments, revisions and modifications to any plan or cost estimates required by this permit shall be submitted to the Director for approval and permit modification as required by all applicable Rules.
4. When the Permittee becomes aware that the Permittee failed to submit any relevant facts in the permit application, or submitted incorrect information in a permit application or in any report to the Director, the Permittee shall promptly submit corrected facts or information.
5. The Permittee shall at all times properly operate and maintain all facilities which are installed or used by the Permittee to achieve compliance with the conditions of this permit.

Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of a back up or auxiliary facility or similar systems only when necessary to achieve compliance with the conditions of this permit.

6. The Permittee shall treat, store and dispose of all contaminated groundwater and other contaminated environmental media in accordance with all applicable Federal, State and local laws.

I.C. Monitoring and Reporting

1. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. The method used to obtain a representative sample of the waste to be analyzed must be the appropriate method from 40 CFR Part 261 Appendix I. Laboratory methods must be those specified in the most recent editions of Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW 846; or Standard Methods for the Examination of Water and Wastewater; (or an equivalent method as specified in the Waste Analysis Plan). Sampling and analyses of groundwater samples shall be conducted in accordance with methods and procedures acceptable to the Director.
2. The Permittee shall retain all records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports and records required by this permit and records of all data used to complete the application for this permit including the certification required by 40 CFR 264.73(b)(9) for a period of at least three (3) years from the date of the sample, measurement, report or record. These periods are automatically extended during the course of any unresolved enforcement action regarding this facility and also may be extended at any time at the Director's discretion.
3. Records of monitoring information shall include:
 - a. The date, exact place and time of sampling or measurements;
 - b. The individual(s) who performed the sampling or measurements;
 - c. The date(s) analyses were performed;
 - d. The individual(s) who performed the analyses;
 - e. The analytical techniques or methods used, the method of sample preservation, and quality assurance methods including method blanks; and
 - f. The results of such analyses and measurements.
4. The Permittee shall report to the Director or his representatives orally as soon as possible, but no later than twenty-four (24) hours from the time the Permittee becomes aware of any circumstances resulting from the operation of the hazardous waste management facility (including periods of non-compliance) which may endanger human health or the environment, including but not limited to:
 - a. Release of any hazardous waste, hazardous waste constituents, or hazardous

- constituents that may cause an endangerment to public drinking water supplies;
- b. Release or discharge of hazardous waste, hazardous waste constituents, or hazardous constituents, or a fire or explosion, which could threaten human health or the environment outside the facility. The description of the occurrence shall include:
 - i. Name, address and telephone number of the owner or operator;
 - ii. Name, address and telephone number of the facility;
 - iii. Date, time and type of incident;
 - iv. Name and quantity of materials involved;
 - v. The extent of injuries, if any;
 - vi. An assessment of actual or potential hazards to the environment and human health inside and outside the facility, where this is applicable; and
 - vii. Estimated quantity and disposition of recovered material that resulted from the incident.
 5. Within fifteen (15) days of becoming aware of any reportable incident as in Permit Condition I.C.4. above, the Permittee shall submit a written report of the incident covering the following:
 - a. Description of occurrence as in Permit Condition I.C.4 above;
 - b. Cause of occurrence;
 - c. Period of occurrence, including exact dates and times;
 - d. Time to which the occurrence is expected to continue (if not already corrected);
 - e. Additional measures planned to correct the occurrence (if not already corrected), and a schedule of those actions; and
 - f. Steps taken or planned to reduce, eliminate, and prevent recurrence, with a schedule of any planned actions.
 6. Reports of noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this Permit shall be submitted no later than fourteen (14) days following each schedule date.
 7. The Permittee shall report instances of non-compliance, other than those described in Permit Conditions I.C.4 and I.C.6, semi-annually on July 15 (covering January 1 - June 30) and January 15 (covering July 1 - December 31). The report shall cover the information requested in Permit Condition I.C.4 for each incident.
 8. All applications, reports or other information submitted to the Director shall be signed and certified according to the requirements in 40 CFR 270.11
 9. All geologic and engineering reports required by this permit shall be signed and sealed by the appropriate Georgia registered professional as defined by state law. Additionally, the following certification statement shall accompany reports containing groundwater data or interpretation:

“I certify that I am a qualified groundwater scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering, and have sufficient training

and experience in groundwater hydrology and related fields, as demonstrated by state registration and completion of accredited university courses, that enable me to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport. I further certify that this report was prepared by myself or by a subordinate working under my direction.”

I.D. Responsibilities

1. Right of Entry. The Permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials and other documents as may be required by law to:
 - a. Enter at reasonable times upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Permit; and
 - d. Sample or monitor, at reasonable times, for the purposes of assuring Permit compliance or as otherwise authorized by the Georgia Hazardous Waste Management Act, any substances or parameters at any location.
2. Transfer of Permits. This permit is not transferable to any persons except after notice to the Director. This permit may be transferred to a new owner or operator only if it is modified or revoked and reissued pursuant to 40 CFR 270.40(b) or 270.41(b)(2). Before transferring ownership or operation of the facility during its operating life, the Permittee shall notify the new owner or operator in writing of the requirements of 40 CFR Parts 264, 268 and 270.
3. Duty to Comply. The Permittee shall comply with all conditions of this Permit, except to the extent and for the duration such non-compliance is authorized by an emergency permit. Any non-compliance with this Permit constitutes a violation of the Georgia Hazardous Waste Management Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or denial of a permit renewal application.
4. Duty to Reapply. If the Permittee wishes to continue an activity regulated by this Permit after the expiration date of this Permit, the Permittee must submit a complete application for a new permit at least one hundred eighty (180) days before this Permit expires. If the facility has not met the investigative and remedial requirements for releases, pursuant to 40 CFR 264.101 and this Permit; and has not met the Environmental Protection Standards requirements for three (3) consecutive years, the Permittee must, within one hundred eighty (180) days before the expiration date of this permit, submit a complete application for renewal of the Permit.

5. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this Permit.
6. Duty to Mitigate. The Permittee shall take all reasonable steps to minimize releases to the environment, and shall carry out all reasonable measures to minimize any adverse impact on human health or the environment resulting from non-compliance with this Permit.
7. Duty to Provide Information. The Permittee shall furnish to the Director, within a reasonable time, any relevant information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Permit, or to determine compliance with this Permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this Permit.
8. Anticipated Non-Compliance. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility, permitted activities, or other activities, which may result in non-compliance with Permit requirements.
9. Reporting Planned Changes. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions, which impact any SWMUs, AOCs or the areas contaminated by them, including voluntary corrective measures to the SWMUs or AOCs referenced in Attachment A of this permit.

I.E. Definitions

For purposes of this Permit, terms used herein shall have the same meaning as those in 40 CFR Parts 124, 260 through 268, 270 and 279, unless this Permit specifically provides otherwise; where terms are not defined in the regulations or the Permit, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

1. Contamination for the purposes of this Permit refers to the presence of any hazardous waste, hazardous waste constituent or hazardous constituent in a concentration, which exceeds the naturally occurring concentration of a constituent in soils in the immediate vicinity of the Facility in areas not affected by the Facility.
2. Corrective Action for prior or continuing releases from solid waste management units, as well as for other releases as described in Condition I.E.10. below, for the purposes of this permit shall be as specified in 40 CFR 264.101 and may include "corrective action" as provided for in 40 CFR 264.100 and other remedial actions for any environmental media as deemed appropriate by the Director to protect public health or the environment. The terms "releases" and "other releases", when used in reference to corrective action requirements of this permit, shall not include releases that the Permittee can demonstrate have been fully remediated within 30 days of discovery.

3. Director shall mean the Director of the Georgia Environmental Protection Division or his/her delegated representative.
4. Facility for purposes of this Permit includes all contiguous land and structures, other appurtenances, and improvements on the land, used for treating, storing, or disposing of hazardous waste. A facility may consist of several treatment, storage, or disposal operational units (e.g., one or more landfills, surface impoundments, or combination of them). For the purposes of implementing corrective action under 40 CFR 264.101, a facility includes all contiguous property under control of the owner or operator seeking a permit under the Georgia Hazardous Waste Management Act.
5. Hazardous Constituent for the purposes of this Permit are those substances listed in 40 CFR Part 261 Appendix VIII and 40 CFR Part 264 Appendix IX, as revised or superseded.
6. Hazardous Waste Constituent for the purposes of this Permit means a constituent that caused the USEPA Administrator to list the hazardous waste in 40 CFR Part 261, Subpart D, or a constituent listed in Table 1 of 40 CFR 261.24.
7. Hazardous Waste for the purposes of this Permit means a hazardous waste as defined in 40 CFR 261.3, and newly defined hazardous waste by USEPA or EPD subsequent to the issuance of this permit.
8. Land Disposal Facility for purposes of this Permit is a facility that uses a surface impoundment, landfill, land treatment or waste pile unit to manage or dispose of hazardous waste pursuant to §12-8-66 of the Georgia Hazardous Waste Management Act, as amended, and §3004 of RCRA, as amended.
9. Qualified Groundwater Scientist for the purpose of this permit means a scientist who has received a baccalaureate or post-graduate degree in the natural sciences or engineering and has sufficient training and experience in groundwater hydrology and related fields, as demonstrated by current State of Georgia registration and completion of accredited university courses, that enable that individual to make sound professional judgments regarding groundwater monitoring and contaminant fate and transport.
10. Release for the purposes of this Permit includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment of any Hazardous Waste, Hazardous Waste Constituent or Hazardous Constituent.
11. Solid Waste Management Unit (SWMU) for the purposes of this Permit includes, but is not limited to, any landfill, surface impoundment, waste pile, land treatment unit, incinerator, injection well, tank (including storage, treatment, and accumulation tanks), container storage unit, wastewater treatment unit, including all conveyances and appurtenances used in waste management or storm water handling, elementary neutralization unit, transfer station, or recycling unit or any other unit from which Hazardous Waste, Hazardous Waste Constituent or Hazardous Constituent might migrate, irrespective of whether the units were intended for the management of solid and/or

Hazardous Waste. SWMUs include areas that have been contaminated by routine and systemic releases of Hazardous Waste, Hazardous Waste Constituent or Hazardous Constituent.

12. Treatment for the purpose of this Permit refers to any method, technique, or process, including neutralization, designed to change the physical, chemical or biological character or composition of any Hazardous Waste so as to neutralize such waste, or so as to recover energy or material resources from the waste, or so as to render such waste non-hazardous, or less hazardous; safer to transport, store, or dispose of; or amenable for recovery, amenable for storage or reduced in volume.

I.F. Conditions Related to Compliance with General Facility Standards (40 CFR Part 264 Subparts B, C, D, E, F, G, H)

The Permittee shall maintain compliance with the following General Facility Standards until the effective date of permit termination, successfully demonstrating completion of procedures and plans described below:

1. The Permittee shall follow the procedures and plans described in detail of the Permit Application, as amended, in accordance with 40 CFR 270.30(a) and the following:
 - a. Post-Closure Care Plan
 - b. Corrective Action Plan
2. The following activities must be carried out as prescribed in 40 CFR 264 Subparts B, C, D and E, in accordance with the Permit Application:
 - a. Security – 40 CFR 264.14(b) and (c)
 - b. Repairs and Inspection Log – 40 CFR 264.15(c) and (d)
 - c. Annual Review of Training – 40 CFR 264.16(c)
 - d. Design and Operation – 40 CFR 264.31
 - e. Testing and Maintenance of Equipment – 40 CFR 264.33
 - f. Access to Communications or Alarm Systems – 40 CFR 264.34
 - g. Operating Record – 40 CFR 264.73 and Disposition of Records – 40 CFR 264.74
 - h. Reports – 40 CFR 264.75 and 40 CFR 264.77
3. The following activities must be carried out as prescribed in 40 CFR Part 264 Subparts G and H and in accordance with Section I of the Permit Application and the Corrective Action Plan, as revised or amended, O.C.G.A. §12-8-68, and Rule 391-3-11-.05 and Rule 391-3-11-.10:
 - a. Post-Closure Care and Use of Property - 40 CFR 264.117
 - b. Post Closure Plan, Amendment of Plan - 40 CFR 264.118
 - c. Notices to Local Land Authority and in Deed to Property - 40 CFR 264.119 and 264.120

- d. Financial Assurance for Post-Closure and Corrective Action. Continuous compliance with 40 CFR 264.145 must be maintained by the Permittee for the amount of the cost estimate for post-closure and corrective action as required by 40 CFR 264.144 until released by the Director as provided in 40 CFR 264.145(i). Continuous compliance with O.C.G.A. §12-8-68, and Rule 391-3-11-.05 is also required.
4. The Permittee must comply with 40 CFR 264.148 whenever necessary.

SECTION II. POST-CLOSURE CARE AT REACTION WATER TANKS T-56/T-57

The Permittee shall continue to be subject of the following Post-Closure Care Plan until the effective date of permit termination, successfully demonstrating completion of procedures and plans described below:

II.A. General Conditions:

1. The Permittee shall perform post-closure care of the Regulated Unit in accordance with the post-closure care plan in the Operation & Maintenance Plan for groundwater monitoring wells in Appendix E-4 of the Permit Application for Post-Closure Care for Reaction Water Tanks T-56/T-57.

II.B. Unit Identification:

The Permittee shall provide post closure care for Reaction Water Tanks T-56 and T-57 (SWMU 22), closed with contaminated groundwater as shown in Appendix E-4 of the Permit Application on Figure 1-2 and in the Groundwater Monitoring Plan dated February 2006.

The tanks (regulated unit) are located within the East Tank Farm area as shown on Figure 1-2 in the Groundwater Monitoring Plan dated February 2006 in the Permit Application. The tanks area is also located in the Solid Waste Management Area (SWMA), which is a combination of six (6) SWMUs, that were identified during the RCRA Facility Investigations (RFIs).

II.C. Waste Identification:

The Permittee previously managed Reaction Water Tanks T-56 and T-57 as a hazardous waste storage unit. The unit was closed as of July 26, 2002 with soil and groundwater contaminated with benzene, toluene, ethylbenzene and xylenes remaining in-place at that time.

II.D. Monitoring and Inspection

The Permittee shall follow the inspection schedule as discussed in Appendix E-4 of the Permit Application and as required by 40 CFR 264.15.

II.E. Post-Closure Care

The Permittee shall perform post-closure care for the closed Reaction Water Tanks T-56 and T-57 in accordance with the post-closure care plan in Appendix E-4 of the Permit Application and as required by 40 CFR 264.117 through 40 CFR 264.120.

SECTION III. GROUNDWATER MONITORING

The Permittee shall install and/or maintain a groundwater monitoring system to comply with the requirements of 40 CFR 264.95, 264.97, and 264.100 as incorporated by the Revised Corrective Action Plan dated January 2025 (CAP), as amended, specified below:

III.A. Well Location and Construction

1. The Permittee shall maintain the following groundwater monitoring wells at the locations specified on Figure 3, according to Section 4.0 of the CAP, and the addition of other wells deemed appropriate by the Director:
 - a. The Permittee shall maintain groundwater monitoring wells SMW-3, SMW-7, SMW-9, SMW-10, SMW-12, MW-46 at the locations specified on Figure 3 of the CAP; and any other groundwater monitoring wells or extraction wells deemed appropriate by the Director to monitor groundwater conditions within and adjacent to all plumes of contamination associated with the facility.
 - b. Monitoring well MW-46 at the location specified on Figure 3 of the CAP shall serve as the background monitoring well for the facility. If the groundwater in this well no longer represents background water conditions for the facility, the Permittee shall submit a plan to install new upgradient well(s).
 - c. Monitoring wells SMW-3, SMW-10, and MW-46 at the locations specified on Figure 3 of the CAP shall be sampled for the site-specific volatile chemicals of concern identified in the EPD approved Human Health Risk Assessment (HHRA) dated June 2023.
 - d. Monitoring wells SMW-7, SMW-9, and MW-12 at the locations specified on Figure 3 of the CAP shall be retained for water level measurements only, to verify that the groundwater flow direction does not change. If the groundwater flow direction changes, either monitoring well SMW-9 or SMW-12 will be sampled to provide downgradient groundwater data for the sampling event, as appropriate.
2. The Permittee shall install and maintain additional wells as necessary to assess changes in the rate and extent of any plume of contamination, or as deemed necessary to maintain compliance with 40 CFR 264.95, 40 CFR 264.97, and 40 CFR 264.100. A plan for the design, location and installation of any additional monitoring wells shall be submitted thirty (30) days prior to installation which, at a minimum, shall include:
 - a. Well construction techniques including casing depth and proposed total depth of well(s);

- b. Well development method(s);
- c. A complete analysis of well construction materials;
- d. A schedule for implementation of construction; and
- e. Provisions for determining the hydraulic conductivity of the applicable aquifer unit(s) at the location of the new well(s).

III.B. Groundwater Protection Standard

1. The groundwater protection standard as required under 40 CFR 264.92, shall consist of the site-specific volatile chemicals of concern identified in the EPD approved HHRA dated June 2023, (ethylbenzene, xylenes, and naphthalene) and Table IV-3, which lists the hazardous constituent and their respective concentration limits as required under 40 CFR 264.93 and 40 CFR 264.94 respectively.
2. The groundwater protection standard further applies to all hazardous waste, hazardous waste constituent, or hazardous constituent releases as deemed appropriate by the Director to protect human health and the environment.

III.C. Compliance Period

1. The compliance period under 40 CFR 264.96 shall begin with the effective date of this permit and continue until the end of the post-closure care period defined in 40 CFR 264.117.
2. If the Permittee is engaged in a corrective action program at the end of the compliance period as defined in Condition III.C.1, the compliance period is extended until the Permittee demonstrates that the groundwater protection standard of has not been exceeded for a period of three (3) consecutive years, as required under 40 CFR 264.100, has been terminated as required by in CFR 264.96(c).

III.D. Groundwater and Surface Water Monitoring Program

The Permittee shall maintain a groundwater monitoring program to demonstrate the effectiveness of the corrective action program required under 40 CFR 264.100 (and 40 CFR 264.101 as related to other releases of hazardous waste, hazardous waste constituent, or hazardous constituent. Groundwater monitoring shall be conducted in conformance with the requirements of 40 CFR 264.100(d) and as specified below:

1. The Permittee shall collect, preserve and analyze all groundwater samples as required by Condition III.F.
2. The Permittee shall determine groundwater quality at all monitoring wells listed in Condition III.A.1.c. for all the parameters specified in Table IV-3 throughout the compliance period including any extension to the compliance period as defined under Condition III.C.2
3. The Permittee shall collect groundwater samples as follows:

- a. All sampling procedures shall be conducted according to section 4.1 of the CAP.
4. The groundwater monitoring program shall include a determination of groundwater surface elevation in all monitoring wells identified in Condition III.A.1.a. each time the groundwater is sampled pursuant to Condition III.D.3. Potentiometric maps created from this information will be presented in annual reports.
5. The Permittee shall determine the groundwater flow rate and direction in the uppermost aquifer as required by 264.99(e). This information will be included in the text of the annual reports.
6. Compliance with the groundwater protection standard, as defined under Condition III.B. will be based upon groundwater monitoring data obtained under Condition III.D.2. that indicate that all constituents listed in Table IV-3 no longer exceed the groundwater protection standard at the monitoring point within or adjacent to the plume(s) of contamination. Comparisons for the purpose of determining compliance shall be made utilizing the statistical procedure described in 40 CFR 264.97(h) and (i).

III.E. Corrective Action Program

The Permittee shall continue to be subject of the following corrective action program until the effective date of permit termination, successfully demonstrating completion of procedures and plans described below:

1. The Permittee shall conduct a corrective action program for contamination defined as originating from the unit identified in Condition II.B., to remove or treat in place any hazardous constituents in the groundwater protection standard (Condition III.B.) that exceed concentration limits in Table IV-3 in groundwater between the point of compliance and the downgradient property boundary as required under 40 CFR 264.100(e)(1), and beyond the property boundary as required under 40 CFR 264.100(e)(2), unless the Permittee can demonstrate to the satisfaction of the Director that, despite the Permittee's best efforts, the Permittee was unable to obtain the necessary permission to undertake such action beyond the property boundary, or such action is not necessary to protect public health or the environment.
2. The Permittee shall treat, store, and dispose of all contaminated groundwater in accordance with all applicable federal, state, and local laws.
3. If the groundwater protection standard is met during the compliance period, the Permittee must continue corrective action to the extent necessary to ensure that the groundwater protection standard is not exceeded. The Permittee may request EPD to allow the corrective action program to be terminated if the groundwater protection standard has not been exceeded for three (3) consecutive years as provided in 40 CFR 264.100(f).

III.F. Sampling and Analysis Procedures

The Permittee shall use the following techniques and procedures when obtaining and analyzing samples from the groundwater monitoring wells described in Condition III.A. to provide a reliable indication of the quality of the groundwater as required under 40 CFR 264.97(d and e)::

1. Samples shall be collected in accordance with Section 4.1 of the CAP and EPA's Region IV Laboratory Services and Applied Science Division (LSASD) Procedures found in its Field Branches Quality System and Technical Procedures.
2. Samples shall be analyzed according to the procedures specified in Section 4.2 of the CAP or as specified in the current Test Methods for Evaluating Solid Waste: Physical/Chemical Methods, SW-846 using whichever procedure is more recent at the time of analysis.
3. Samples shall be tracked and controlled using the chain of custody procedures specified in the EPA's Region IV Laboratory Services and Applied Science Division (LSASD) Procedures found in its Field Branches Quality System and Technical Procedures.

III.G. Reporting, Recordkeeping, and Response

1. The Groundwater Summary Report will include a summary of the three groundwater sampling events, a summary table showing groundwater analytical data compared to the PRGs, an updated potentiometric surface map, and a groundwater plume map.
2. The Permittee shall enter all monitoring, testing, and analytical data obtained pursuant to Section 4.3 CAP and Section IV of this permit in the operating record as required by 40 CFR 264.73(b)(6).
3. The Permittee shall submit a report to the Director on the effectiveness of the corrective action program annually including all monitoring, testing, and analytical data obtained under this Section III.D.
4. The requirements of Condition III.G.2 and III.G.3 shall be met by a single, combined annual report.

III.H. Permit Modification

1. If the Permittee meets or exceeds the requirements of 40 CFR 264.100 and meets the groundwater protection standard at the point of compliance and throughout the contaminant plume for three (3) consecutive years, the Permittee may submit a permit modification pursuant to 40 CFR 270.41 and 40 CFR 270.42 to terminate corrective action and establish an alternate groundwater monitoring program.

III.I. Duty of Permittee

The Permittee shall assure that groundwater monitoring and corrective action measures necessary to achieve compliance with 40 CFR 264.100 and the groundwater protection standard are taken during the compliance period.

SECTION IV. CORRECTIVE ACTION FOR RELEASES FROM SOLID WASTE MANAGEMENT UNITS, AREAS OF CONCERN, AND OTHER RELEASES

IV.A. Applicability

The conditions of this section apply to the Solid Waste Management Units (SWMUs) and Areas of Concern (AOCs) listed in Attachment A of this Permit, as identified in the RCRA Facility Assessments (RFA) dated November 1997, and any additional SWMUs or AOCs discovered by any other means. The determination of the need for and subsequent implementation of corrective action is required by 40 CFR 264.101(a) and §12-8-66 of the Georgia Hazardous Waste Management Act for releases from all SWMUs and AOCs contained within the facility property boundaries and, as required by §12-8-66 of the Georgia Hazardous Waste Management Act and 40 CFR 264.101(c), for releases extending beyond the facility property boundaries.

IV.B. Notification and Assessment Requirements for Newly Identified SWMUs and AOCs

1. Within fifteen (15) days of the Permittee's discovery of any SWMUs or AOC under Condition IV.A., the Permittee shall notify the Director in writing of such discovery.
2. The Director shall notify the Permittee in writing of the discovery of any SWMUs or AOC under Condition IV.A.
3. Within sixty (60) days of the Permittee's discovery pursuant to Condition IV.B.1. or within sixty (60) days of receipt of the Director's notification under Condition IV.B.2., the Permittee shall submit to the Director the following information for each SWMU or AOC:
 - a. Designation of type and function of the unit;
 - b. Location of each unit in a topographic map of appropriate scale, as required by 40 CFR 270.14(b)(19);
 - c. General dimensions, capacities and structural description of the unit(s) (supply any available plans/drawings);
 - d. Dates that the unit was operated;
 - e. Description of the wastes that have been managed at/in the unit(s) to the extent available. Include any available data on hazardous constituents in the wastes; and

- f. All available information pertaining to any release of hazardous waste, hazardous constituents or hazardous wastes constituents (to include groundwater data, soil analyses, air and/or surface water data).
4. The Director shall review the information submitted pursuant to Condition IV.B.3. and notify the Permittee in writing as to the need for further investigation and/or corrective action as required by Conditions IV.D., IV.F. or IV.G.

IV.C. Notification Requirements for Newly Discovered Releases at Previously Identified SWMUs and AOC

1. Within thirty (30) days of the Permittee's discovery of a previously unidentified release(s) from any SWMU or AOC identified under Condition IV.A. the Permittee shall notify the Director in writing of such discovery.
2. The Director shall notify the Permittee in writing of the discovery of any previously unidentified release(s) from any SWMU or AOC previously discovered under Condition IV.A.
3. Within ninety (90) days of the date of the Permittee's discovery under Condition IV.C.1. or within ninety (90) days of the date of receipt of the Director's notification under Condition IV.C.2., the Permittee, if requested by the Director, shall submit to the Director a RCRA Facility Investigation Work Plan pursuant to Condition IV.F.

IV.D. Verification Investigation

1. The Director may require the Permittee to submit a Verification Investigation (VI) Work Plan for any SWMU or AOC discovered under Condition IV.A. on a schedule to be determined by the Director. The VI Work Plan shall describe all actions necessary to verify the presence or absence of a release from any SWMU or AOC. The VI Work Plan shall include a schedule of implementation, which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the VI Work Plan continuing through submission of the VI Report required by Condition IV.D.3.
2. Upon receipt of the Director's written approval of the VI Work Plan, the Permittee shall implement the Work Plan in accordance with the schedule of implementation contained therein.
4. The Permittee shall submit a VI Report in accordance with the schedule of implementation contained within the approved VI Work Plan. The VI Report shall describe all actions taken to verify the presence or absence of releases including all data collected during the VI. The Director shall review the VI Report and notify the Permittee in writing of the need for further investigation and/or corrective action pursuant to Condition IV.F. and/or IV.G.

IV.E. Interim Measures (IM)

Upon the Director's concurrence, the Permittee may conduct interim measures to contain, remove or treat contamination resulting from releases from any SWMU or AOC as necessary to protect human health and the environment. Such interim measures may be conducted concurrently with any investigations required by this permit.

IV.F. RCRA Facility Investigation (RFI)

1. Within ninety (90) days of the effective date of this permit for any SWMU or AOC identified pursuant to Condition IV.A., and within ninety (90) days of the date of receipt of the Director's written notice pursuant to Conditions IV.B.4., IV.C.3. and/or IV.D.3., the Permittee shall submit to the Director a complete RFI Work Plan.
2. The RFI Work Plan shall provide a description of the specific actions necessary to determine the nature and extent of releases from any SWMU and AOC identified by Conditions IV.A., IV.B.4., IV.C.3. and/or IV.D.3., including potential migration pathways for those releases (e.g. air, land, surface water, and groundwater), actual or potential receptors and applicable background concentrations. The Permittee must provide sufficient justification that migration through a potential pathway is not likely if a potential migration pathway associated with a release is not included in the Work Plan. Such deletions are subject to the approval of the Director.
3. The RFI Work Plan shall include a schedule of implementation, which includes intermediate milestones beginning with the Permittee's receipt of the Director's written approval of the RFI Work Plan and continuing through submission of the RFI Report required by Condition IV.F.4. Upon approval by the Director, the Permittee shall implement the RFI Work Plan in accordance with the schedule contained in the approved Work Plan.
4. The Permittee shall submit a complete RFI Report in accordance with the schedule of implementation contained in the approved RFI Work Plan. The Report shall provide a summary of all activities undertaken during the RFI to implement the approved Work Plan. The Report shall provide a complete description of the nature and extent of all releases evaluated during the RFI including sources, migration pathways, actual or potential receptors and applicable background concentrations. The RFI Report shall address all releases that extend beyond the facility property boundary unless the Permittee demonstrates to the Director's satisfaction that despite the Permittee's best efforts, the Permittee were unable to obtain permission to undertake actions required by the Work Plan, or such action is not necessary to protect public health and the environment.
5. The Director shall review the RFI Report required under Condition IV.F.4. and notify the Permittee in writing of the need for further investigation and/or corrective action as required by Condition IV.G. and 40 CFR 264.101(a) and 40 CFR 264.101(c).

IV.G. Corrective Action

1. Within ninety (90) days of the Permittee's receipt of the Director's written notice referenced in Condition IV.F.5., the Permittee shall submit a Corrective Action Plan (CAP) to EPD. The CAP shall provide a description of the corrective measures to be taken with regard to releases from any SWMU and AOC identified in Condition IV.F.4. as necessary to protect human health and the environment. The CAP shall be submitted as a request for permit modification in accordance with 40 CFR 270.41 and 40 CFR 270.42.
2. The CAP shall include a schedule of implementation, intermediate milestones beginning with the issuance of the permit modification requested pursuant to Condition III.H.
3. The CAP shall include a demonstration of financial responsibility for such corrective action, as required by 40 CFR 264.101(b).
5. The conditions of this Section apply to the corrective action for the contamination associated with the SWMUs at the facility, as described in the Corrective Action Plan, Appendix E-5 of the Revised Corrective Action Plan (dated January 2025), as amended.
 - a. The groundwater remediation levels established pursuant to 40 CFR 264.101, shall consist of Table IV-2, which lists the hazardous constituents and their respective concentration limits. The groundwater remediation levels apply to all hazardous waste or hazardous constituent releases as deemed appropriate by the Director to protect human health and the environment.
 - b. The groundwater monitoring period shall be defined as continuing until the groundwater remediation levels have not been exceeded for a period of three (3) consecutive years and until corrective action for releases from SWMUs as required under 40 CFR 264.101 has been terminated. The groundwater monitoring period shall begin with the effective date of this permit.

IV.H. Schedule of Compliance

1. All plans and reports required by this Section are subject to the approval of the Director prior to implementation. The Director shall specify in writing any deficiencies of any plan and/or report submitted by the Permittee pursuant to this Section of the permit, including a schedule for resubmission of revised documents to address said deficiencies. The Permittee shall revise all submittals as specified by the Director.
2. For any schedule of implementation required by this Section, if the time required to complete any interim activity is more than one (1) year, the schedule shall specify interim dates for the submission of reports of progress towards satisfaction of the interim requirements.

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3. Extensions of the due date for the submittal of any plan or report may be granted by the Director based on the Permittee's demonstration that sufficient justification for the extension exists.
4. Upon approval by the Director, all plans and reports shall be enforceable as Conditions of this Permit.
5. If at any time the Director determines that any plan or report required under this Section no longer satisfies the requirement of this permit or 40 CFR 264.101, the Director will so notify the Permittee in writing and request that an amended plan or report be submitted in accordance with a schedule to be specified

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**TABLE IV-1
GROUNDWATER PROTECTION STANDARDS FOR POST CLOSURE CARE UNIT**

HAZARDOUS CONSTITUENTS	CONCENTRATION LIMIT (µg/L)
Benzene	5¹
Ethylbenzene	700¹
Toluene	1,000¹
Xylenes	10,000¹
Arsenic	50²
4-Methylphenol	Background³
2,4-Dimethylphenol	Background³
Acrolein	Background³
Naphthalene	Background³
2-Methylphenol	Background³
Phenol	Background³

¹ Concentration Limit from MCL

² Concentration Limit from 264.94(a)(2)

³ Concentration Limit from 264.94(a)(1)

**TABLE IV-2
GROUNDWATER REMEDIATION LEVELS FOR CORRECTIVE ACTION FOR
RELEASES FROM SWMUs**

HAZARDOUS CONSTITUENTS	CONCENTRATION LIMIT (µg/L)¹
Benzene	5
Ethylbenzene	700
Toluene	1,000
Xylenes	10,000
Barium	2,000
Lead	15
Naphthalene	231
2-Methylnaphthalene	46
Bis-(2-Ethylhexyl)phthalate	6

¹Concentration Limit based on Approved CAP dated September 2005

**TABLE IV-3
GROUNDWATER REMEDIATION LEVELS FOR CORRECTIVE ACTION FOR
RELEASES FROM SWMUs**

HAZARDOUS CONSTITUENTS	CONCENTRATION LIMIT (µg/L)¹
Ethylbenzene	700
Xylenes	10,000
Naphthalene	231

¹Concentration Limit based on Approved CAP dated January 2025

Attachment A

Summary Listing of Units

Solid Waste Management Unit	Required Follow-up*
1.Stormwater Runoff Valve/Pipe	None
2.Loading Dock	None
3.Diesel Spill Area	None
4.Former Tank Farm Boxcar Unloading Area	None
5.Empty Drum Accumulation Area	None
6.Treated Wastewater Tank Area	None
7.Solid Release Area	None
8.Former Tank Farm Area Gum Plant Pipes	None
9.Stormwater Sump (Sediment Trap)	None
10.Wastewater Pretreatment Area	None
11.Abandoned Pipe Area	None
12.Solid Waste Compactor	None
13.Storm Water Trench	None
14.Steam Blowdown Area	None
15.Para-nonylphenol Storage Tank Area	None
16.Maleic Anhydride Loading Area	None
17.Fuel Oil Tank Area	None
18.Resin Plant U-Drains	None
19.Resin Plant Loading Dock	None
20.SWMA, Non-Reclaimable Waste Reaction Oil Tank Car Area	Corrective Action Complete
21.K-5 Recovery Tank Area	None
22.Permitted Tanks T-56/57 Area	Post Closure Care Complete
23.SWMA, Former Filter Cake Drying Area	Corrective Action Complete
24.SWMA, Tank Car/Truck Raw Material Unloading	Corrective Action Complete
25.SWMA, T-46 Area	Corrective Action Complete
26.SWMA, Wastewater Storage Tanks T-48, T-49, T-50, T-51	Corrective Action Complete
27.East Unloading Catch Basin	None
28.Former Rosin Pit Area	None
29.Dowtherm Spill Area	None
30.Former Tank Farm Area Diesel UST	None
31.SWMA, Former Tank Farm Area Plant Wastewater U-Drain	Corrective Action Complete

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32.T-1 90-day Storage Drum	Corrective Action Complete
33.Quality Control Lab Satellite Containers	None
34.Wastewater Lab Satellite Container	None
35.Process Lab Waste Containers	None
36.Retention Basin	Corrective Action Complete
37.Area East of Retention Basin	None

*Note:

When required follow-up is designated as "None" no further action is required at this time. None designations include SWMUs where the RFI determined there was no evidence of a release, those SWMUs that screened out of the Risk Assessment, those SWMUs determined by the Risk Assessment to have no potentially unacceptable level of risk, and those SWMUs where clean closure or corrective action has been completed.

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